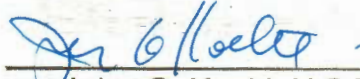


Via ECF

July 2, 2021

The Honorable John G. Koeltl  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
Courtroom 12B  
500 Pearl Street  
New York, New York 10007-1312

APPLICATION GRANTED  
SO ORDERED

7/6/21   
John G. Koeltl, U.S.D.J.

**Re: Mirror Worlds Technologies, LLC v. Facebook, Inc.**  
**Civil Action No. 1:17-cv-03473 (JGK)**

Dear Judge Koeltl:

The parties in the above-captioned matter respectfully request permission to place under seal Dkt. 264-15, which is **Exhibit 15** to the Declaration of Phillip E. Morton in Support of Facebook's Opposition to Plaintiff's Motion to Exclude Improper Expert Testimony of Facebook's Expert Witnesses. Exhibit 15 contains a full copy of Mirror Worlds' First Supplemental Responses and Objections to Facebook's Second Set of Interrogatories (3-10). Mirror Worlds' responses to these interrogatories include discussion of sensitive and proprietary information, including citation to documents that were produced subject to the Protective Order in this case and designated "Highly Confidential – Attorneys' Eyes Only." Furthermore, these responses describe highly confidential assessments of both the value of certain Mirror Worlds patents, as well as the amount of revenue that could be recovered by asserting said patents in litigation. Such information, if made public, would cause Mirror Worlds commercial harm. Accordingly, the parties respectfully request leave to place this exhibit under seal in its entirety. In its place, Facebook will file an appropriately excerpted version of this exhibit, which does not include the above-described confidential material, on the public docket.

The parties greatly appreciate your consideration in this matter.

Respectfully submitted,

/s/ Heidi L. Keefe

Heidi L. Keefe

*Counsel for Defendant  
Facebook, Inc.*

/s/ Minna Chan

Minna Chan

*Counsel for Plaintiff Mirror Worlds  
Technologies, LLC*

cc: All Counsel of Record via ECF

USDC SDNY  
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DATE FILED: 7-6-21